

**JWB Environmental Engineering**

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July 29, 1998

Ms. Marcia Earl  
Indiana Department of Environmental Management  
Office of Solid and Hazardous Waste Management  
100 North Senate Avenue  
Indianapolis, IN 46206-6015

Re: Special Waste Application No. 80144  
Milbank Manufacturing, Howard County

Dear Ms. Earl:

I have been assisting Milbank Manufacturing with several environmental matters. One item that I have evaluated is whether the wastewater treatment sludge from the system that treats the wastewater from their metal finishing operation is a hazardous or special waste.

Since they do a phosphating operation, they are classified as a metal finisher and fall under the metal finishing categorical pretreatment standard.

They do not do electroplating. So their wastewater treatment sludges would not be a listed F006 waste.

Since they process some aluminum through the metal finishing system, there is a potential for the wastewater treatment sludges to be classified as a listed F019 hazardous waste, if there is a conversion coating of aluminum occurring. I have reviewed the MSDSs and discussed the chemicals and processes used in stages 3 and 5 of the system with Mr. Ken Supe and Chris Collier of DuBois Chemicals. It is our opinion that the processes in neither of these stages could be considered conversion coating of aluminum since no significant coating is applied in either stage.

Since the wastewater treatment sludges are not listed F006 or F019 hazardous wastes, they are not listed hazardous wastes.

If you have questions of a technical nature please call me at 317-574-0350. For questions of an administrative nature please call Mr. Roger Glendening at 765-452-8361.

Sincerely,

  
J.W. Bloemer, P.E., CHMM

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Post-It Fax Note	7671	Date	7/29/98	# of pages	1
To	Roger Glendening	From	J.W. Bloemer		
Co./Dept.	Milbank Mfg	Co.	JWB Env. Engr.		
Phone #		Phone #	317-574-0350		
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